



SWIS Digital Inspections Program Data Exchange Agreement (Version 1.0)

Instructions: This document describes all of the conditions a Local Enforcement Agency (LEA) must agree to, and follow, in order to electronically submit solid waste inspection data to the California Integrated Waste Management Board (CIWMB).

Prior to submitting this data exchange agreement, an LEA representative must:

1. Review all materials on the SWIS Digital Inspections Program web site (<http://www.ciwmb.ca.gov/SWIS/DIP/>);
2. Use the testing site to receive a "Readiness Code" for each electronic data submittal method the LEA will use;
3. Carefully read the entirety of this Data Exchange Agreement document; and,
4. Complete this cover page, have it signed by LEA's Program Manager, and mail to the address at the bottom of this page.

City/County:

Division/Department Name:

Selection of Electronic Inspection Data Submittal Method

Indicate which electronic data submittal method(s) the LEA will use by entering the appropriate Readiness Code(s). A representative of the LEA must have previously accessed the test site and received a "Readiness Code" for each method the LEA wishes to use. Although selecting a method(s) indicates the LEA's electronic data submission intent, LEAs can continue to submitting inspections via paper forms if necessary as this is a voluntary program.

Web Forms

Enter Readiness Code:

LEAs complete a web form for each inspection.

XML Batch Uploads

Enter Readiness Code:

Authorized users can upload a batch of inspection records formatted in the Board's specified XML format.

XML "Real time" Web Service

Not available until later 2009.

Real time submission of individual records through machine-to-machine exchange of XML formatted data.

Contacts and Users

Provide the name, title, and email address for the LEA's primary program and technical contacts. Also provide information for any other LEA staff who will need to have access to the system. Please provide the email address the contact/user will use to sign in to the system via their Cal/EPA WebPass (<https://secure.calepa.ca.gov/WebPass/>).

User Type	Name	Title	Email (WebPass)
Program Contact:			
Technical Contact:			
Other User:			
Other User:			

Attach additional sheets if more users required

LEA Authorization and Signature

The LEA referenced above wishes to participate in this voluntary program and electronically submit solid waste inspection data to the California Integrated Waste Management Board using the method(s) and contact(s) listed above. The LEA agrees to all the conditions and described in the entirety of this data exchange agreement.

Program Manager Name:

Date:

Program Manager Signature: _____

Mail this signed cover page to: SWIS DIP Coordinator, (MS-10), California Integrated Waste Management Board, 1001 I Street, Sacramento, CA 95812

1.0 Overview

1.1 Purpose and Parties

This data exchange agreement defines the terms and conditions under which **Local Enforcement Agencies** (LEAs) (CCR Title 14 18011) will participate in the voluntary SWIS Digital Inspections Program (SWIS DIP) for electronic submittal of solid waste facility¹ inspection data to the **California Integrated Waste Management Board** (CIWMB). After reviewing all of the information about the program on the SWIS DIP Web site (<http://www.ciwmb.ca.gov/SWIS/DIP/>) and having one or more LEA representatives use the test site to demonstrate the LEA's ability to perform SWIS DIP data exchanges, the LEA's **Program Manager** will sign the cover page of this data exchange agreement document and indicate the LEA's **Primary Program Contact**, **Primary Technical Contact**, and any other number of contacts who should access/rights to perform SWIS DIP data exchanges.

This agreement is not a legal document and does not supersede any existing agreements or Memoranda of Understanding between the LEA and CIWMB. It is only intended to address the specifics on the one-way electronic exchange of solid waste inspection data from an LEA to the CIWMB. Participation in this voluntary program may require the LEA to evaluate and possibly modify their existing business practices relative to finalizing and submitting inspection data.

1.2 Background

The CIWMB's Solid Waste Information System (SWIS) database contains information about the state's solid waste facilities, including inspection and enforcement data. Much of the SWIS data is directly available to the public via the CIWMB SWIS Internet site at <http://www.ciwmb.ca.gov/SWIS/>. The SWIS Digital Inspections Program was initiated in 2008 at the request of LEAs and the California Conference of Directors of Environmental Health (CCDEH) for the Board to provide opportunities for LEAs to submit data to the Board using industry-standard data exchange standards such as XML and web services. The program's focus involves providing LEAs with **pragmatic** techniques they can **voluntarily** use instead of paper submission, minimization of CIWMB costs for implementing these new approaches, and maintaining the CIWMB's existing investments in electronic processing of paper forms. Because of the focus on pragmatic approaches and low costs, the program uses simple approaches and avoids dependencies on technologies and data standards that are complex or not yet widely adopted/accepted.

The program's goals for LEAs includes providing LEAs already using their own data systems with industry standard methods to provide their data to the CIWMB, as well as providing LEAs without data systems a method to easily submit data via a web form. The CIWMB's goals for the program include assisting LEAs, increasing the accuracy and completeness of inspection data submittals, decreasing the time it takes for LEAs to submit inspection data to the CIWMB, and decreasing the time it takes CIWMB to process, review, and make inspection data available to the public via the SWIS Internet site.

¹ In the context of the SWIS Digital Inspections Program, "solid waste facility inspections" refers to all facilities (permitted facilities), all Disposal Sites, and all EA Notifications (operations). See 14 CCR 18083.

1.3 Definition of Data

The program solely involves electronic submission of solid waste inspection data as mandated of LEAs by PRC 43218 and [CCR Title 14, Section 18083](#), as well as any attachments the LEA generates as part of a specific facility inspection. Such attachments could include field notes, photos, maps, spreadsheets, monitoring data, etc. that the LEA generates or converts into typical electronic document file formats (e.g., .doc, .pdf, .gif, .jpg, .xls, etc.). Unlike with the Board's existing paper form process, electronic inspection data **must** be fully completed and include comments for each violation or area of concern, or the entire electronic submission will not be accepted.

The program does **not** include:

- Documents for solid waste facility enforcement, permit applications, etc.
- Inspection data for solid waste facilities that **do not** have a Board-assigned SWIS number.
- Inspection data for waste tire facilities².

2.0 Roles and Responsibilities

2.1 Legal Framework

LEA participation in the SWIS Digital Inspections Project does not change or negate any statutory and regulatory requirements for LEA inspection submittals to the CIWMB (PRC 43218 and 14 CCR 18083). LEA participation in the SWIS Digital Inspection Program is voluntary, and dependent upon the LEA demonstrating (and maintaining) their technical ability to use the system (via a test version of the system). LEAs are responsible for submitting inspection data by their mandated deadlines, regardless of their current status or ability to use the SWIS DIP System. For example, if an LEA was suddenly unable to use the SWIS DIP system due to a failure of their in-house data system or loss of key staff, the LEA would still be responsible for submitting data via paper form (or making other arrangements with CIWMB staff).

An LEA's electronic inspection data submittal is equivalent to submitting a paper inspection form via US postal mail if:

- The inspection meets all of the LEAs legal mandates regarding solid waste facility inspections; and,
- The inspection data is entered/uploaded by an LEA staff member or other representative previously designated by the LEA as having authority to use the SWIS DIP system for inspection submittals; and,
- The SWIS DIP system does not reject the submittal because it is in the wrong format, is missing data, has incomplete/insufficient data, is a duplicate record, or other errors; and,
- The SWIS DIP system provides a message indicating the inspection record(s) has been accepted into the system.

As with paper forms, the CIWMB still retains the right to contact the LEA and request additional/clarifying information before it loads the inspection into the CIWMB's SWIS Database. However, the data validations performed by the SWIS DIP system should greatly reduce the incidence of post-submittal follow-ups.

In the event an LEA modifies an inspection record data after it has been submitted to the CIWMB (e.g., to correct an LEA's data entry error), the LEA is responsible for ensuring the facility operator/owner is provided with the modified inspection and a new updated record is electronically resubmitted to the CIWMB.

² Because waste tire inspection forms are more complex than solid waste facility inspection forms, the Board deferred their electronic submittal until a sufficient number of LEAs adopt solid waste facility submittals to allow a cost effective program for waste tire inspection data.

2.2 Contacts

Defined below are key contacts in the SWIS Digital Inspections Program:

SWIS DIP Coordinator: The CIWMB's primary point of contact for all LEA's participating or interested in SWIS DIP.

LEA Program Manager: The LEA's Program Manager is the person who has overall administrative responsibility for all aspects of the LEA's solid waste program. The LEA's current Program Manager must notify the SWIS DIP Coordinator immediately via a written communication (email or paper mail) if they are taking over from a previous program director.

LEA Primary Program Contact: The LEA's primary contact with the CIWMB and SWIS DIP Coordinator for its participation in SWIS DIP. **This person is the CIWMB's first point of contact if there are problems or questions.** This person may perform the actual data entry/uploads into the SWIS DIP system, although they may supervise/delegate this activity to the LEA Technical Contact or other users. The Primary Program Contact would be responsible for notifying the SWIS DIP Coordinator via written communications about any changes to the LEA's users/contacts. The LEA's Program Manager must notify the CIWMB immediately in a written communication when a Primary Program Contact changes.

LEA Technical Contact: The LEA's primary technical contact for SWIS DIP that has knowledge of XML data transfer and related information technologies. This person could be the same as the LEA Primary Program Contact for simpler data exchanges via web forms (see 2.3 below), but for XML-related data exchanges would generally be an information technology professional, either on the LEA's staff or hired as a contractor.

Other Users: The LEA's Program Manager or Primary Program Contact can designate other users to access and use the SWIS DIP System. Other users could be LEA staff or contractors. LEA management/staff is responsible for all actions performed by their contractors. LEAs can opt to identify as many other system users as they truly need, but having a smaller number of authorized users is a best security practice.

The LEA is responsible for alerting the CIWMB's SWIS DIP coordinator **immediately** if the LEA's program contact, technical contact, or any other user authorized by the LEA is no longer employed/affiliated with the LEA or should otherwise not be permitted to access the system. Any data submitted by a user no-longer employed and/or affiliated with an LEA could result in the CIWMB removing that data from SWIS and requiring appropriate re-submittal by the LEA.

To ensure the security and integrity of the SWIS DIP system, a separate Cal/EPA WebPass **must** be created for each user of the system. Authorized users of the SWIS DIP system **must** protect their Cal/EPA WebPass password to ensure the integrity of the system. If an LEA representative suspects their password may have been compromised, they should go to the Cal/EPA WebPass home page (<https://secure.calepa.ca.gov/WebPass/>) and change it immediately. If you are unable to access your WebPass account because it has been "hijacked" by another user, contact the Cal/EPA Webmaster immediately at webmaster@calepa.ca.gov.

2.3 Exchange Methods

The SWIS DIP Program offers three different data exchange methods.

Web Form: One or more pre-determined LEA representatives will access a secured CIWMB Internet site and complete a web form for each individual inspection record. All required fields must be completed correctly before an individual inspection web form submission will be accepted.

XML Batch Submission: LEA staff/representatives/contractors with XML (and probably programming) expertise will format their inspection records into a batch XML file using the CIWMB's prescribed SWIS Inspection Schema (data definition) at <http://www.ciwmbo.ca.gov/SWIS/DIP/Schema/>. One or more pre-determined LEA representatives will access a secured CIWMB Internet site and upload the XML batch file to the site. If the XML file is improperly formatted, any record is a duplicate, or **any** data field in **any** record does not match the prescribed SWIS Inspection Schema, the **entire** batch submission will be rejected and the LEA representative will be provided with detailed error information to assist in correcting the batch file and successfully resubmitting it.

XML Web Service: LEA staff/representatives/contractors with programming and XML expertise will perform custom programming within the LEA's data automation environment that allows its workstations/servers to directly submit individual XML-formatted inspection records (using the CIWMB's prescribed SWIS Inspection Schema at <http://www.ciwmbo.ca.gov/SWIS/DIP/Schema/>) to the CIWMB's secured XML web service using a CIWMB prescribed SOAP ([Simple Object Access Protocol](#)) header (including an LEA security keycode issued by the CIWMB). If an individual inspection record is improperly formatted, incomplete, or a duplicate, it will be rejected and the web service will return an XML response with error information.

An LEA can choose to use one or more of these methods. All three methods require at least one LEA representative to acquire a Cal/EPA WebPass account and access the SWIS DIP web site to varying degrees.

2.4 LEA Self-Testing and Readiness Codes

The self-testing portion of the SWIS DIP system is open to any LEA representative, vendor, or other interested party who establishes a Cal/EPA WebPass (<https://secure.calepa.ca.gov/WebPass/>) to access the site, and allows for testing of each data exchange method supported by SWIS DIP. LEAs are responsible for demonstrating their ability to successfully use each SWIS DIP exchange method (i.e., Web Forms, XML Batch, XML Web Service) before they can submit production data to the CIWMB. To do this, at least one representative from the LEA must log into the SWIS DIP test site and conduct a series of test submissions as instructed in the test web pages. Upon successfully completing a sufficient number of consecutive tests for a data exchange method (e.g., fully entering and successfully submitting three inspections using the web form method), the test pages will present the LEA with a six character "Readiness Code" for that data exchange method. The self-testing is more rigorous for XML-related data exchange methods, and LEAs should plan on tapping representatives who have professional information technology background.

An LEA must acquire a separate "Readiness Code" for each data exchange method they wish to use for production data submissions. These readiness codes must be entered onto the application/cover sheet of this document (which the LEA will send to the CIWMB) to indicate the LEA's ability to exchange data using that method. See the SWIS DIP web site for more information about self-testing.

LEAs can start production data submissions in one method (e.g., web forms) and later evaluate/test a different method (e.g., XML Batch).

2.5 Exchange Schedule

LEAs are already legally required to submit inspections to the Board within 30 days of the inspection, and this schedule should be followed for SWIS DIP as well. However, since one of the program's key goals was to make inspection data available in a timelier manner to the CIWMB and the public, participating LEAs are encouraged to submit data as quickly as possible.

If an LEA's designated representatives do not access/use the SWIS DIP site for more than 30 days, the Primary Program Contact will begin receiving periodic reminder emails until the system is accessed.

Inspections submitted by LEAs via SWIS DIP are maintained in a "hold area" or queue until CIWMB staff has conducted a final review of the electronic inspection record for accuracy and completeness. These reviews will occur within one week of an inspection's submittal by an LEA, after which CIWMB staff may request additional/clarifying information from the LEA, or otherwise post the inspection into production and the CIWMB Internet site.

2.6 Dispute Resolution

LEAs and the CIWMB shall make a good faith effort to resolve any data exchange issues in a timely fashion while minimizing the burden on both parties. In the event an issue cannot be resolved by the LEA and SWIS DIP Program staff, the Director of the CIWMB's Waste Compliance and Mitigation Program will be considered the final authority for this program.

2.7 Financial Considerations

LEAs that choose to participate in the voluntary SWIS DIP Program will provide the staff and information technology (IT) resources necessary to participate in the SWIS DIP program. LEAs should consult with LEA Grant Program staff for approval of this type of expenditure.

2.8 Record Retention

All production inspection data accepted from an LEA as being free of errors or incomplete data will be retained by the CIWMB until the inspected solid waste facility has no further interest as a site of environmental interest. The CIWMB anticipates that most solid waste facilities, regardless of their status, would continue to be of environmental interest into the indefinite future.

3.0 Data Stewardship

3.1 Data Ownership

The LEA is responsible for retaining on site records of the solid waste facilities they regulate (14 CCR 18020). Additionally, the LEA is responsible for forwarding copies of inspection records (and any relevant corrections/updates) to the facility operator **and** the CIWMB (14 CCR 18083). The CIWMB in the course of its activities publishes the copies of LEA-supplied inspection data on its Internet site for public access.

3.2 Use and Distribution of Data

All inspection data provided to the CIWMB in either electronic or paper format is reviewed for accuracy and then made available to the public via web pages on the CIWMB Internet site at <http://www.ciwmbo.ca.gov/SWIS/>. This data is also available for download in Excel and XML format.

3.3 Data Elements

The SWIS inspection data referred to in this document includes the data elements defined in the CIWMB's SWIS Inspection Schema (data definition) at <http://www.ciwmbo.ca.gov/SWIS/DIP/Schema/>. The schema provides detailed specifications about fields, field names, data types, and data validations.

While the SWIS Inspection Schema reflects all of the data elements currently shown as fields on the CIWMB's paper solid waste facility inspection forms, it also includes added data requirements for some existing fields as well as several additional fields required for electronic data submission. These include:

LocalInspectionID: A required LEA-assigned alphanumeric identifier uniquely identifying an inspection record within the LEA's data systems. The LEA can never reuse this identifier for another inspection record. If an LEA submits a record with a duplicate *LocalInspectionID*, the record will be rejected unless it has a separate *VersionNumber* (see below) and generally appears to be an update to an existing record (e.g., same SWIS Number, inspection date, etc.).

InspectionStatus: Inspections can be entered via XML or web form in "draft" status (rather than the default status of "SubmitToBoard") to allow other LEA staff/managers the opportunity to internally review/approve the inspection. The inspection will not be viewable by CIWMB staff until the status is set to "SubmitToBoard."

VersionNumber: A required integer for XML submissions indicating the version of a specific inspection record (normally set to 1). If an LEA must resubmit corrected data for an inspection record to the CIWMB, they must provide the same *LocalInspectionID* but increment the *VersionNumber* value.

RegulationComment: Each violation or area of concern **must** include a comment. If a single larger comment can span multiple issues, the *RegulationComment* field must include text such as "See overall inspection comments" and then provide these comments in the *Comments* field.

In addition to these fields, there are several portions of the XML schema that allow LEAs to embed attachments to their XML inspection submissions like photos, maps, etc. LEAs can alternatively manually upload these attachments via the SWIS DIP web pages. Electronic attachments must be legible.

There are a number of optional fields in the schema that were added to the CIWMB's paper inspection forms over time at the request of LEAs (e.g., TimeIn, TimeOut, OwnerName, ReceivedBy, etc.). The CIWMB will capture, store, and display any data provided in these data fields, but LEAs are free to use or ignore these optional fields as they wish.

3.4 Data Quality

The LEA and the CIWMB will provide notification and documentation to the other partner when either decides that data quality, completeness, or timeliness has fallen short of expectations.

Resubmissions: If any data in an LEA's inspection record has changed since it was electronically submitted to the CIWMB, the LEA must make sure it provides the facility operator/owner with the modified inspections results and then resubmits a new record to the CIWMB. This is done by providing the same *LocationInspectionID* and different *VersionNumber* field.

3.5 Data Timeliness

LEAs must submit inspections data to the Board within 30 days of the inspection.

3.6 Draft Data Submissions

LEAs may enter inspection records in "draft" status to allow other LEA staff/managers the opportunity to internally review/approve the inspection before it is submitted to the Board. The SWIS DIP inspection detail web pages include functionality to email a copy of the draft (or final) version of the inspection report to any email

address. Draft inspections will not be viewable by CIWMB staff until the status is set to “SubmitToBoard.” Inspection records with a “draft” status will be automatically deleted from the system 45 days after the date of the inspection.

4.0 Agreement Administration

4.1 Period of Agreement / Agreement Termination

The period of this agreement will be from the date the LEA representative signs this document’s cover page until either the CIWMB or the LEA terminate the agreement. Either party can terminate the agreement with 90 days advance notice.

The CIWMB will periodically review the LEA’s participation in the SWIS Digital Inspections Program, both over the course of time and more specifically during the LEA’s evaluation. The CIWMB may choose to terminate an agreement with the LEA if any of these situations arise:

- No representative of the LEA has accessed the program site for at least six months;
- An LEA representative misuses the site;
- An LEA representative does not maintain the security of their Cal/EPA WebPass;
- An LEA’s participation in the program over an extended period of time involves excessive amounts of CIWMB staff time to provide assistance, troubleshooting, problem resolution, etc.

4.2 Contacts

The cover page of this document provides areas for the LEA to list their Primary Program Contact, Primary Technical Contact, Program Director, and any other contacts that should access to the system to submit inspection data.

4.3 Agreement Amendments

Contacts: The technical or other contacts provided by the LEA on the cover page of this document can be amended by the LEA or the CIWMB via any type of written request/communication from the LEA’s primary program contact or program director to the CIWMB. Changing the LEA’s program director or primary program contact requires a written communication from the current program director.

Other Provisions: If other provisions of this agreement are amended by the CIWMB, the LEA’s primary program contact and program director will receive a written communication from the CIWMB identifying the change(s). If the LEA does not respond to this communication within the timeframe specified in the written communication, the CIWMB will assume the LEA agrees to the changes.

4.3 Approval Signatures

The cover page of this document must be signed by the LEA’s Program Director (or other representative of similar title and/rank).